

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v

MOHAMMED AZHARUDDIN CHHIPA,

Defendant.

Case No. 1:23-mj-91

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Gary T. Marosy, being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I make this affidavit in support of a criminal complaint and arrest warrant charging MOHAMMED AZHARUDDIN CHHIPA (hereafter: “CHHIPA”) with providing and attempting to provide material support to a designated foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant (ISIL) (a/k/a the Islamic State of Iraq and Syria (ISIS)) (hereafter: ISIS), in violation of Title 18, United States Code, Section 2339B (hereafter: SUBJECT OFFENSE).

2. The investigation to date has established probable cause to believe that beginning on or about August 15, 2021, and continuing through January 18, 2022, CHHIPA provided and attempted to provide material support to ISIS in the form of monetary instruments intended to support ISIS members, knowing that the organization is a designated foreign terrorist organization, that the organization has engaged or engages in terrorist activity, or that the organization has engaged or engages in terrorism in violation of Title 18, United States Code, Section 2339B.

3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), assigned to the Washington Field Office Joint Terrorism Task Force, where my duties include investigating criminal violations relating to international terrorism, including those set forth in 18 U.S.C. § 2339B, and have been since October 1, 2018. I am a law enforcement officer of the United States under 18 U.S.C. § 2510(7), authorized to conduct investigations, execute warrants, and make arrests for violation of the laws of the United States. In this capacity, I have participated in investigations of individuals engaged in the support of terrorism and terrorist activity. In preparation for this assignment, and as part of your affiant’s continuing education, I have successfully completed law enforcement training, to include formal courses and training exercises. I have participated in many aspects of federal investigations including, but not limited to conducting interviews, analysis of communications and financial records, and assisting with the preparation and execution of search warrants. I have investigated counterterrorism and criminal cases, and am familiar with the search, examination, and exploitation of information obtained from cellular phones, computers, and the internet, including social media, electronic mail, on-line messaging applications, and metadata associated therewith. Among other duties, I am currently involved in the investigation of CHHIPA, who lives in the Eastern District of Virginia.

4. Based on my training, experience, and the facts as set forth in this affidavit, I respectfully submit that there is probable cause to believe that CHHIPA violated the SUBJECT OFFENSE. I am familiar with the facts and circumstances of this investigation from: (a) my personal knowledge of the investigation; (b) observations of other law enforcement officers and FBI employees; (c) information provided to me by other law enforcement officials; and (d) information otherwise obtained by credible and reliable sources. This affidavit is being

submitted for the limited purpose of obtaining a search warrant. As a result, it does not include every fact observed by me or known to the government. If I assert that a statement was made by an individual, that statement is described in substance and in part, but my assertion is not intended to constitute a verbatim recitation of the entire statement.

Probable Cause

Background Concerning the Islamic State

5. On October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

6. On May 15, 2014, the Secretary of State amended the designation of al-Qaeda in Iraq as a FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist (SDGT) entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary of State also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham ("ISIS" – which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publicly released on June 29, 2014, ISIS announced a formal change of its name to the Islamic State. On September 21, 2015, the Secretary added the following aliases to the Islamic State of Iraq and the Levant listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

Background Concerning the Al Hawl (Syria) Internally Displaced Persons Camp

7. From a review of publicly available information, your affiant is aware of the following information concerning the Al Hawl (also transliterated as Al Hol) Internally Displaced Persons (“IDP”) Camp in Syria.

8. The camp was established in 2016 to hold Iraqis and Syrians who fled from ISIS controlled lands. In March 2019, during the battle of Baghuz, over 50,000 women and children flooded the camp, which required the creation of a new section known as the “Annex.” The Annex was specifically designated to house foreign nationals.

9. The Annex is guarded by soldiers of the Syrian Democratic Forces. As such, the residents of the Annex are not free to leave whenever they want. This restriction has led to the practice of smuggling persons out of the camp. Guards are bribed with money to facilitate the escape of detained persons.

10. The connection between the women and children in the Annex and ISIS is significant. Many were married to fighters who were killed or captured on the battlefield. In some instances, the women’s home countries assess that they are capable and willing to carry out violent acts including terrorist attacks and are therefore reluctant to repatriate their citizens.

11. Within the Annex, a group of women have implemented strict Sharia law, which is a term that describes living under a very strict interpretation of Islam, similar to the ideology that ISIS operates under. They have attacked and killed others who did not obey. The children of the camp can be seen in videos pledging their allegiance to the Islamic State and expressing extremist views.

12. Although ISIS no longer maintains a physical caliphate, the Annex is assessed to be a stronghold of ISIS ideology.

The Defendant

13. CHHIPA was born November 5, 1989 in India and is a naturalized United States citizen. At the time of all activity referenced herein, from 2008 through the present, CHHIPA has lived in Fairfax, Centerville, and Springfield, Virginia, within the Eastern District of Virginia.

Relevant Law

14. I am advised that, Title 18, U.S.C. Section 2339B – Providing material support or resources to a designated foreign terrorist organization, provides in pertinent part:

- a. Offense. – Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so shall be fined under this title, imprisoned not more than 20 years, or both, and if the death of any person results, shall be imprisoned for any term of years or for life. To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization, that the organization has engaged or engages in terrorist activity, or that the organization as engaged or engages in terrorism.

I am also advised that, Title 18 USC. Section 2339A(b)(1) provides, in pertinent part:

The term “material support” or resources means any property, tangible, or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.

Background Concerning the Investigation of CHHIPA

15. The United States, including the FBI, is conducting a criminal investigation of CHHIPA regarding possible violations of 18 U.S.C Section 2339B.

Social Media & Messaging Accounts Used by CHHIPA

16. During the course of the investigation, the FBI identified over 10 different social media accounts, using a variety of aliases, which were known to be used by CHHIPA from 2019 through 2022. Through an analysis of legal process, including multiple search warrants, the FBI

linked the accounts to CHHIPA in a variety of ways, including by: CHHIPA self-identifying on the account by writing his name in chat conversations; CHHIPA stating that an account is a new one that is replacing a prior account previously linked to him; IP address information linking back to CHHIPA's home address; and/or the account was signed in on a physical device seized from CHHIPA, among other means.

17. CHHIPA also utilized numerous messaging accounts on an encrypted, secure platform (Messaging Platform 1), which he believed was a more secure form of communication. The FBI was able to determine that CHHIPA was the user of the accounts in a variety of ways, including: CHHIPA sent his handle in conversations on the aforementioned social media accounts when he wanted to move conversations to a more secure platform; he self-identified in conversations with an FBI Controlled Persona (hereafter, FBICP);¹ or he showed up to meetings that were set up using the messaging account, among other means.

Social Media & Messaging Accounts Used by ISIS MEMBER 1

18. During the course of the investigation, the FBI identified a British-born female living in Syria who is a member of, and fundraiser for, ISIS ("ISIS MEMBER 1"), with whom CHHIPA frequently communicated. ISIS MEMBER 1 is still at large and located in Syria. The FBI identified over 10 different social media accounts and secure messaging accounts on Messaging Platform 1 that were known to be used by ISIS MEMBER 1 from 2020-2022. The accounts were linked to ISIS MEMBER 1 in a variety of ways, including: ISIS MEMBER 1 provided her phone number using the account, which a cooperating witness identified as being used by ISIS MEMBER 1; ISIS MEMBER 1 stated that she was the same person who used a

¹ FBI Controlled Persona (FBICP) refers to an account operated either by an FBI undercover agent or a confidential human source. All communications referenced herein with FBICPs have been preserved.

prior account that was previously linked to her; and/or ISIS MEMBER 1 used the same profile name, among other means.

CHHIPA's Ideological Alignment with ISIS

19. CHHIPA, using his various social media accounts, has made numerous posts and re-posts in support of ISIS and violent jihad. For example, records obtained by legal process showed that on or about March 18, 2019, CHHIPA posted a picture of a sword with the words, “The sword is a must. Jihad is a must. Nothing terrifies the enemies – the enemies of the Muslimin– nothing terrifies them like power, force and, weapons...Jihad is a brick and solid pillar of the Shari’ah...This din [religion] can not be established and firmly planted without jihad, ever.” That same day, CHHIPA posted a quote from Shaykh al-‘Allamah Humud ibn ‘Ulqa ash-Shu’aybi,² which was taken from an encrypted messaging channel. The quote stated the sword and jihad were both “a must” and anything less would be of no use to disbelievers. The quote went on to say that Islam could not be established or gain a foothold without jihad.

20. Records from CHHIPA's social media accounts also revealed that CHHIPA, in a chat conversation on or about March 16, 2019, stated, “I’ve already planted the seeds and realized that I only have 3-4 destinations in life and I accept whatever Allaah Aza Wajjal will give me inshaAllaah. 1) Prison 2) Hijrah/Jihaad 3) Shahadah.”³

² According to open sources, Shaykh al-‘Allamah Humud Ibn ‘Ulqa ash-Shu’aybi was a renowned radical Saudi cleric who was supportive of the Afghan Taliban and the September 11, 2001 attacks.

³ Based on your affiant's training and experience, CHHIPA's reference to Hijrah/jihad likely refers to his desire to travel outside of the United States to fight in defense of Muslim lands. Shahadah refers to an act of martyrdom, which would be consistent with an act conducted on behalf of ISIS.

21. In June 2019, FBICP-1 engaged CHHIPA in a conversation on Messaging Platform 1 in which CHHIPA admitted his desire to conduct an attack⁴ against infidels and hypocrites and die in the name of Allah.

22. Later in the same conversation with FBICP1, CHHIPA, while discussing jihad said, “Yes of course so right now I support dawlah.⁵ They are on the Haqq⁶ from what I have seen...”

23. In August 2019, the FBI executed a search warrant of CHHIPA’s residence, which at that time was located in Fairfax, VA. Approximately 100 evidence items were seized, which included numerous electronic devices. The subsequent review of the seized materials identified thousands of videos, pictures, essays, books, notes, and search histories about extremist ideology, jihad, ISIS, and violent propaganda on multiple devices to include CHHIPA’s main cell phone and desktop computer. Some examples include:

- a. Instructions on how to build explosive devices;
- b. Images containing quotes from Anwar Al-Awlaki and Ahmad Musa Jabril;⁷
- c. PDF copies of Dabiq⁸ magazine;

⁴ The word choice used in this instance is “qital” which your affiant understands can only mean to kill or wage war.

⁵ In this context, the word “dawlah” is known to be short for “Dawlah Islamiyah” – the Islamic State.

⁶ The word “haaq” is directly translated to “truth” and can be interpreted as “right” and “reality”. In this context, it is known to refer to the “true” or “right” interpretation of Islam as practiced by ISIS.

⁷ Ahmad Musa Jabril is a U.S. born Islamic preacher/cleric. His teachings are known to be radical and inspirational to many Islamic jihadists to include members of ISIS.

- d. Images of Islamic fighters with weapons; and,
- e. Images depicting what appears to be a beheading of an ISIS prisoner.

24. In May 2020, FBICP-2 engaged CHHIPA in a direct message conversation on Messaging Platform 1 in which CHHIPA and FBICP-2 discussed his support for ISIS. CHHIPA stated that he was “aware” of the “burning of that pilot” and believed that such an act was “permissible.” Based on my training, experience, and knowledge of this investigation, I believe CHHIPA was referring to a 2015 incident where ISIS captured a Jordanian military pilot and burned him alive inside of a cage.

25. As described in greater detail below, CHHIPA has sent large amounts of money overseas. In the May 2020 conversation referenced in paragraph 24, FBICP-2 asked CHHIPA if he would approve of his money directly contributing to restoring the caliphate, and CHHIPA responded affirmatively. Later in the conversation, CHHIPA envisaged his future under a restored Islamic State and expressed his desire to make Hijrah.

Chhipa Begins Sending Money to Support Female ISIS Members

26. In October 2019, CHHIPA made a public post on one of his social media profiles in which he applied one of the last messages of ISIS leader Abu Bakr al-Baghdadi to the ISIS women held in the Al Hol IDP Camp. Al-Baghdadi’s message was to “Act,” and CHHIPA believed that al-Baghdadi was specifically referring to providing financial support to the ISIS women in the Al-Hol camp in order to, among other things, assist them in getting smuggled out of the camp.

⁸ Dabiq magazine was an online magazine published in multiple languages by the Islamic State that was used for recruitment and radicalization.

27. At the end of the post, CHHIPA shared a social media account of a “sister who is currently in the camp.”

28. A review of that social media account and other social media accounts attributed to the same individual showed numerous posts that were supportive of ISIS and corroborated her location in the Al-Hol camp. An example of this individual’s support for ISIS can be found in a public social media post from September 2019. At the bottom of the post, the author shared a link to a channel on Messaging Platform 1. FBI personnel observed that CHHIPA “liked” this post.⁹ Additionally, FBI personnel viewed the content of the link and observed a description of the channel which stated: “Send some bullets here by sending some money for Mujahideen in Shaam.”¹⁰

29. Beginning in November 2019, records from Coinbase Inc. and Binance.com, show that CHHIPA began depositing cash into his bank account, converting the cash to virtual currency, and sending virtual currency to Turkey.

30. Your affiant is aware that money sent to Syria is frequently sent in this manner, and subsequent investigation revealed that CHHIPA does in fact send money to ISIS members in Syria through Turkish intermediaries. For example, a review of search warrant returns provided by a social media company showed that ISIS MEMBER 1 told CHHIPA that money sent to her is “never sent directly to me it[’]s always sent to [T]urkey and then secretly sent to me with no tracks.” CHHIPA replied saying, “I know how it works.”

31. In March 2020, FBICP-1 elicited details from CHHIPA over Messaging Platform 1 about who he chooses to send money to and why. CHHIPA stated that he was “...very strict on

⁹ The FBI has no information as to whether CHHIPA actually clicked on the link to the channel.

¹⁰ Arabic for the region also known as the “Levant,” which includes modern day Syria.

who [he] help[s]...” and, when given the choice, prefers to support sisters who support ISIS.

CHHIPA also agreed to assist FBICP-1 and verify that a specific woman was an ISIS supporter and could receive money. Furthermore, CHHIPA shared with FBICP-1 that he had accidentally sent money to some sisters who “supported nusra,¹¹” but afterwards, he “found the right sisters...who support [Dawlah].”

32. In May 2020, FBICP-2 engaged CHHIPA on Messaging Platform 1 in a direct message conversation in which CHHIPA and FBICP-2 further discussed his reasons for financially supporting the women of ISIS. Specifically, CHHIPA stated that he was “...even more eager to give more [to the ISIS sisters] because [he knew] the reward for it [was] much more [as] their husbands died as shahadah...and some are still fighting.” CHHIPA believed that financially “[supporting] the family of a mujaahid [sic]...is [like] he has fought.” Continuing, CHHIPA responded positively when asked by FBICP-2 if he (CHHIPA) was okay with his money being used to restore the ISIS caliphate.

33. Your affiant believes that CHHIPA is aware that women can be and have been active in actual combat for the Islamic State. As an example, FBI personnel have observed multiple postings on his social media pages depicting women, dressed in traditional Islamic attire, holding and firing AK-47 style rifles.

34. In September 2020, FBICP-1 again engaged CHHIPA in a direct message conversation on Messaging Platform 1 regarding CHHIPA’s financial efforts to assist ISIS women. FBICP-1 discussed with CHHIPA whether it was okay that the women used the money to escape that camp and whether the women would seek to rejoin the Islamic caliphate once out.

¹¹ The Al-Nusra Front was an al-Qaeda affiliated organization operating in the same areas in Syria as ISIS, with rival political goals.

CHHIPA responded to FBICP-1's question with a question, saying, "...if they are free again...where else are they going to go?" This statement indicates that CHHIPA fully expected that women would seek to re-join ISIS once free from the camp.

35. Beginning in or about October 2019, CHHIPA began using social media to fundraise for "sisters" in the Al Hol IDP camp in Syria. CHHIPA frequently claimed that the money was for "shelter," but information provided by a social media company pursuant to a search warrant showed that CHHIPA fully intended to assist women in getting smuggled out of the camp. As an example, in July 2020, CHHIPA reported that "3 sisters have gathered enough money," and in August 2020, told another user that he "[focuses] on the release of [sisters]."

36. Financial records obtained from Apple Federal Credit Union pursuant to multiple grand jury subpoenas showed that between November 2019 and July 2022 CHHIPA purchased over \$172,000 in virtual currency. Additional financial records obtained from Coinbase & Binance showed that CHHIPA received over \$15,000 in virtual currency from other individuals bringing the total amount of virtual currency moved by CHHIPA to over \$188,000. Further analysis of those records showed that over \$18,000 went to wallets known to be used by ISIS women located in Syria, over \$35,000 went to wallets used in close proximity to the meetings between CHHIPA and FBICP-3 (described in greater detail below) including one wallet that ISIS MEMBER 1 claims to have access to, \$61,000 went to cryptocurrency wallets located in Turkey, and over \$60,000 remains unaccounted for. As described above in paragraph 30, search warrant data shows that the virtual currency was converted back to cash and secretly passed to the intended recipients.

ISIS MEMBER 1's ideological alignment with and support for ISIS

37. A review of search warrant returns provided by a social media company showed that ISIS MEMBER 1 was prolific in soliciting other users for money. Your affiant notes that ISIS MEMBER 1 is security conscious and does not typically discuss nefarious destinations for the money on the social media platforms. Nevertheless, ISIS MEMBER 1 did post ISIS propaganda and did acknowledge being involved in smuggling operations to get ISIS women out of the camps. For example, in the aforementioned search warrant returns, ISIS MEMBER 1 stated, “I [receive] the money and then they get smuggled out and once they reach outside the prison camps we pay the smuggler.”

38. In or about March 2020, ISIS MEMBER 1, using Messaging Platform 1, shared a pro-ISIS video with FBICP-3 and lamented that she enjoyed her life prior to the Al Hol camp during which she lived under Sharia law.¹² ISIS MEMBER 1 also self-identified as a member of ISIS, explained that she had been smuggled out of the Al Hol camp, and desired to re-marry an ISIS fighter.

39. In December 2020, ISIS MEMBER 1, using Messaging Platform 1, in a direct message conversation with FBICP-4, discussed operational security measures for an unnamed ISIS fighter, saying, “the brother cannot give you proof of himself...because he’s a mujahjid [sic]....If he gets caught...they will bomb him.”

40. In December 2020, FBICP-4 engaged ISIS MEMBER 1 in a direct message conversation on Messaging Platform 1 in which they discussed attack planning. ISIS MEMBER 1, offering assistance to FBICP-2, stated, “Akhi [brother] we need to know where he wants to do

¹² According to open source information, ISIS enforced a strict adherence to Sharia law; a set of laws/rules/regulations that are part of the Islamic tradition.

it [attack] in order to organize for him weapons...he should wait because the kuffar¹³ [can't] gather [in large groups] anywhere so it's not gonna be effective much...unless he knows a place where [there's] a lot of kuffar like government place or military places...we can help with weapons but it should at a place and time where it will do the most...damage.”

41. In or about March 2020, ISIS MEMBER 1, as further detailed below, began soliciting FBICP-3 to assist her with moving money through CHHIPA.

CHHIPA's Relationship with ISIS MEMBER 1 and Their Financial Support for ISIS

42. A review of the publicly available information from a messaging channel operated by CHHIPA yielded numerous posts, beginning in December 2020, in which CHHIPA shared posts from ISIS MEMBER 1's social media account. One post in particular sought to fundraise for the “sisters” in the camps who were the “families of those who sacrificed their lives for Islam.”

43. In or about March 2021, PayPal Inc. denied CHHIPA further use of its services to receive money. This action interrupted CHHIPA's financial operations and the ability to collect money for ISIS MEMBER 1.

44. In or about March 2021, in a direct response to the above, ISIS MEMBER 1 reached out to FBICP-3, with whom she had a prior relationship and believed to be physically located in the Maryland area. ISIS MEMBER 1 asked FBICP-3 if they could open a PayPal account, collect donations, and then transfer the money to a “Brother” (referring to CHHIPA) who was located nearby.

45. ISIS MEMBER 1 further explained in a direct message conversation with FBICP-3, that the “brother (CHHIPA) is 10000000 percent trustworthy... [and] he has been helping us

¹³ A derogatory term for non-Muslims; “non-believers.”

and sisters in the camp for over 2 years. ...he is known for gathering money for sisters in the camp.” ISIS MEMBER 1 went on to reveal that she also sends money for “brothers in different [provinces],” and that the “he,” referring to CHHIPA, also assists with that as well.

46. ISIS MEMBER 1 subsequently initiated a three-way chat with FBICP-3 and CHHIPA on Messaging Platform 1, and began communicating with CHHIPA and FBICP-3 both in the three-way chat and directly with each, to discuss the specifics of the fundraising efforts to and through CHHIPA to ISIS MEMBER 1.

47. In November 2021, Coinbase provided records in response to a grand jury subpoena that showed that between April 2021 and August 2021, CHHIPA continued to move cryptocurrency through his accounts. Based on this, the FBI assessed that CHHIPA and ISIS MEMBER 1 found an alternate means of moving money and no longer needed the assistance of FBICP-3.

48. In or about August 2021, FBICP-3 contacted ISIS MEMBER 1 and initiated a conversation in which FBICP-3 expressed a desire to send money to ISIS MEMBER 1. During the subsequent direct message conversations, ISIS MEMBER 1, unsolicited, asked FBICP-3 if they could send it to the “bro who lives in Virginia” and provided an account on which to contact CHHIPA. Later in the conversation, ISIS MEMBER 1 tells FBICP-3 that she will split FBICP-3’s money between the “sisters in the camp and the mujahideen.”¹⁴

49. Following the conversation with ISIS MEMBER 1, FBICP-3 initiated a direct message conversation with CHHIPA wherein CHHIPA agreed to meet FBICP-3 and accept the money.

¹⁴ In this context, the term “mujahideen” is assessed to mean an ISIS fighter.

50. On or about August 15, 2021, CHHIPA met with FBICP-3 in Falls Church, VA, and accepted \$300.00 USD in cash. CHHIPA subsequently deposited the money into his Apple Federal Credit Union account, converted the cash to Bitcoin, and sent it to ISIS MEMBER 1.

51. On or about August 16, 2021, ISIS MEMBER 1 told FBICP-3 in a direct message that she had picked up the money and asked to confirm that part of the money should be sent to the “muj.”¹⁵

52. On or about October 27, 2021, FBICP-3, in a direct message with ISIS MEMBER 1, stated that they had some extra money and wished to send it to ISIS MEMBER 1. ISIS MEMBER 1 directed FBICP-3 to discuss the transfer in the group chat with CHHIPA.

53. On or about October 27, 2021, in the course of a three-way chat involving CHHIPA, ISIS MEMBER 1, and FBICP-3, FBICP-3 arranged to meet CHHIPA the following day to pass money to CHHIPA for ISIS MEMBER 1.

54. On or about October 28, 2021, in the course of a three-way chat involving CHHIPA, ISIS MEMBER 1, and FBICP-3, FBICP-3 asked ISIS MEMBER 1 if there was anyone who needed money more than her [ISIS MEMBER 1]. ISIS MEMBER 1 replied that she would “put it aside for the brs.”¹⁶

¹⁵ In this context, “muj” is assessed to be short for mujahideen.

¹⁶ In this context, the term “brs” is assessed to be short for “brothers.” Your affiant is aware that it is common among ISIS supporters to use the term “brothers” to refer to male fighters, or mujahideen. For example, on CHHIPA’s phone, he had a post that listed measures for evading detection, and one such measure specifically referenced using the term *Ikhwan* (Arabic for brothers) as a substitute for mujahideen.

55. On or about October 28, 2021, CHHIPA met¹⁷ with FBICP-3 in Falls Church, VA and accepted \$120.00 USD in cash. CHHIPA subsequently deposited the money into his Apple Federal Credit Union account, converted the cash to Bitcoin, and sent it to ISIS MEMBER 1.

56. On or about November 3, 2021, ISIS MEMBER 1, in another three way chat with CHHIPA and FBICP-3, indicated that she had received the money and would send it to “the brothers.”

57. On or about November 17, 2021, FBICP-3 began to set up a third money transfer with ISIS MEMBER 1 and CHHIPA.

58. On or about November 18, 2021, in the course of a three-way chat involving CHHIPA, ISIS MEMBER 1, and FBICP-3, FBICP-3 told ISIS MEMBER 1 that the money should be split up so that \$100 went for the “sisters,” \$100 for “the muj,” and the remaining \$60 should be kept by ISIS MEMBER 1.

59. On or about November 18, 2021, CHHIPA met¹⁸ with FBICP-3 in Falls Church, VA, and accepted \$260.00 USD in cash. CHHIPA subsequently deposited the money into his Apple Federal Credit Union account, converted the cash to Bitcoin, and sent it to ISIS MEMBER 1.

60. On or about November 21, 2021, CHHIPA, in the three-way chat, referenced FBICP-3’s previous message about sending money to “the muj” and admonished them for

¹⁷ During this meeting, CHHIPA remained in his vehicle while his mother physically interacted with the FBI Controlled Person, accepted the cash, and returned to the vehicle (driven by CHHIPA).

¹⁸ During this meeting, CHHIPA remained in his vehicle while his mother physically interacted with the FBI Controlled Person, accepted the cash, and returned to the vehicle (driven by CHHIPA).

discussing such topics openly. CHHIPA further advised FBICP-3 to delete the chat and only discuss future allocations of money directly with the “sister” [ISIS MEMBER 1].

61. On or about November 24, 2021, ISIS MEMBER 1, in a direct message with FBICP-3, confirmed that she had received the money and had sent the \$100 allocated for the brothers and the \$60 allocated for her all to the “bros” because “the brothers...(were) in need.”

62. On or about January 11, 2022, FBICP-3 began to set up a fourth meeting with CHHIPA.

63. In subsequent direct message conversations between ISIS MEMBER 1 and FBICP-3, ISIS MEMBER 1 stated that she would send FBICP-3’s money “to the mj.”¹⁹

64. On or about January 13, 2022, CHHIPA met²⁰ with FBICP-3 in Falls Church, VA, and accepted \$160.00 USD in cash. CHHIPA subsequently deposited the money into his Apple Federal Credit Union account, converted the cash to Bitcoin, and sent it to ISIS MEMBER 1.

65. On or about January 18, 2022, ISIS MEMBER 1, in a direct message with FBICP-3, confirmed that she had received the money sent a few weeks before and informed FBICP-3 that she (ISIS MEMBER 1) would “send it for the mj.”

Summary

66. Based on the foregoing information, your affiant concludes that there is sufficient probable cause to believe that MOHAMMED CHHIPA, while located in Virginia, attempted to

¹⁹ In this instance, “mj” is taken to be a shorthand for “muj” which has previously been linked to ISIS fighters or “mujahideen.”

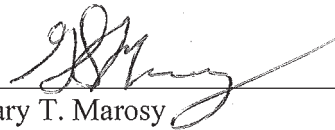
²⁰ During this meeting, CHHIPA remained in his vehicle while his mother physically interacted with the FBI Controlled person, accepted the cash, and returned to the vehicle (driven by CHHIPA).

provide material support to a designated foreign terrorist organization, in the form of collecting, transmitting, receiving, and distributing money to ISIS members in violation of the SUBJECT OFFENSE.

Conclusion

67. I respectfully request that the Court issue a warrant for the arrest of the MOHAMMED CHHIPA.

Respectfully submitted,



Gary T. Marosy
Special Agent
Federal Bureau of Investigation

Respectfully submitted and attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on May 4, 2023.

Lindsey Vaala Digitally signed by Lindsey Vaala
Date: 2023.05.04 11:33:33 -04'00'

THE HONORABLE LINDSEY R. VAALA
UNITED STATES MAGISTRATE JUDGE